

FILED

MAR 19 1992

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Attorney for Defendant
GERALD ARMSTRONG

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

RECEIVED

MAR 19 1992

CHURCH OF SCIENTOLOGY
INTERNATIONAL, a California
not-for-profit religious
corporation;

Plaintiffs,

vs.

GERALD ARMSTRONG; DOES 1
through 25, inclusive,

Defendants.

No. 152 229

HUB LAW OFFICES

DECLARATION OF FORD GREENE
ON THE SUBJECT OF WAKEFIELD
V. CHURCH OF SCIENTOLOGY OF
CALIFORNIA (11TH CIR. 1991)
SUBMITTED IN OPPOSITION TO
ORDER TO SHOW CAUSE RE
PRELIMINARY INJUNCTION

Date: March 20, 1992
Time: 9:00 a.m.
Dept: 4 - Specially Set

FORD GREENE declares:

1. I am an attorney licensed to practice law in the Courts
of the State of California and am the attorney of record for
Gerald Armstrong, defendant herein.

2. The facts hereinafter stated are known to me of my own
personal knowledge and I can and will testify to the same if
called upon to do so.

3. During August and September 1989, I was the attorney of
record for Margery Wakefield, the plaintiff in a case entitled
Wakefield v. Church of Scientology of California, United States

COPY

1 District Court, Middle District of Florida, Tampa Division, Case
2 No. 82-1313-CIV-T-10A.

3 4. I became involved in that case after the case-in-chief
4 had been dismissed by a secret settlement agreement between Ms.
5 Wakefield and Scientology.

6 5. At the time I became involved in the case, Scientology
7 was prosecuting secret, sealed enforcement proceedings by means of
8 contempt charges against Ms. Wakefield for allegedly violating
9 confidentiality provisions of the secret settlement agreement.
10 These proceedings were closed to the public and the press. Due to
11 such closure the Tampa Tribune and the St. Petersburg Times sought
12 to intervene in order to contest the fact that secret proceedings
13 were transpiring in consequence of which an individual could be
14 jailed for exercising her right to Free Speech.

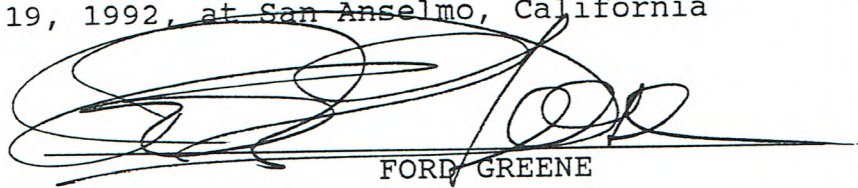
15 6. Most of the file in Wakefield is sealed; thus I am
16 precluded from stating all I know regarding that case. I am not
17 precluded, however, from stating that the contempt enforcement
18 proceedings prosecuted by Scientology against Ms. Wakefield were
19 based upon a preliminary injunction it obtained in secret, closed
20 proceedings against Ms. Wakefield while she was not represented by
21 counsel. Ms. Wakefield also has a history of mental illness and
22 instability. Based upon the foregoing, it is my opinion that the
23 issues in Wakefield were never truly litigated and therefore the
24 appellate opinion relied on by Scientology fails to properly
25 address the issues raised by its brand of secret, settlement
26 agreement.

27 ///

28 ///

1 Under penalty of perjury pursuant to the laws of the State of
2 California I hereby declare that the foregoing is true and correct
3 according to my first-hand knowledge, except those matters stated
4 to be on information and belief, and as to those matters, I
5 believe them to be true.

6 Executed on March 19, 1992, at San Anselmo, California

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8 FORD GREENE

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PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California. I served the following documents: DECLARATION OF FORD GREENE ON THE SUBJECT OF WAKEFIELD V. CHURCH OF SCIENTOLOGY OF CALIFORNIA (11TH CIR. 1991) SUBMITTED IN OPPOSITION TO ORDER TO SHOW CAUSE RE PRELIMINARY INJUNCTION

on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

Andrew H. Wilson
WILSON, RYAN & CAMPILONGO
235 Montgomery Street, Suite 450
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Graham E. Berry, Esquire
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LAURIE J. BARTILSON, ESQ.
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213-662-6419

[X] (By Mail) I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.

[X] (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: March 19, 1992